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United States District Court

Southern District of California

(Hon. Peter C. Lewis)

11 UNITED STATES OF AMERICA,) Criminal Case No. 08CR1278DMS(PCL)
12 Plaintiff,)
13 v.)
14 WILLIAM NAVARRO, and)
ENRIQUE GOMEZ,) Date: May 13, 2008
15) Time: 1:30 p.m.
16 Defendant(s).) Judge: Peter C. Lewis
Room: El Centro

Notice Of Hearing

19 On May 13, 2008 at 1:30 p.m., or as soon thereafter as counsel may be heard, material
20 witness Jorge Arrellano [the "Material Witness"] by and through his counsel, attorney Ned Lynch, will
21 bring a motion for a court order to conduct the videotaped deposition of the Material Witness and
22 thereafter release him from custody. This motion will be heard by Magistrate Judge Peter C. Lewis
23 in the El Centro, California courtroom of the U.S. District Court for the Southern District of
24 California.

25 The parties are further notified that if they oppose this motion, in addition to filing
26 opposition papers, they can make arrangements for a telephonic appearance, although it may
27 be necessary to agree to waiver of the appearance of the defendant for a telephonic
28 appearance.

Motion

2 The Material Witness, by and through his counsel, attorney Ned Lynch, and pursuant to
3 Federal Rules of Criminal Procedure 15 and 18 U.S.C. § 3144, move this court for an order to take
4 his videotaped deposition and thereafter release him from custody at the conclusion of the deposition
5 for his return to his home country.

6 This motion is based upon this notice, the memorandum of points and authorities filed in
7 support of this motion, the declaration of attorney Ned Lynch, the files and records in the case noted
8 above, and any and all other evidence and arguments that may be brought to the court's attention
9 prior to or during the hearing on this motion.

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11 || Dated: April 29, 2008

s/Ned Lynch

Ned Lynch, Attorney for the Material Witness
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